

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KH-REIT II FUNDING XXII, LLC,	§	
<i>Plaintiff,</i>	§	
v.	§	Case No. 4:22-CV-3730
GRANT MEADOWS, L.L.C. and	§	
SHAHIN JAMEA,	§	
<i>Defendants.</i>	§	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT**

TO THE HONORABLE KEITH P. ELLISON:

Plaintiff KH-REIT II Funding XXII, LLC (“Knighthead”) files this unopposed motion for extension of time to file its reply in support of its pending motion for summary judgment.

On February 6, 2024, Plaintiff filed a motion for summary judgment. (Doc. 37). Defendants filed their response on February 27, 2024. (Doc. 46). Under the Local Rules and this Court’s procedures, Plaintiff’s reply is due on March 5, 2024.

Plaintiff respectfully requests a 10-day extension of the deadline for filing a reply. The new deadline would be March 15, 2024. There is good cause for this extension as Plaintiff’s counsel has had numerous commitments that make meeting the March 5 deadline difficult. These commitments include a summary judgment hearing on March 5, 2024 and a deposition of a key witness on March 6, 2024—both in *Regalado v. Unbarlievable LLC*, Cause No. C-1-CV-23-005256, in the County Court at Law No. 2, Travis County, Texas.

Plaintiff's counsel has conferred with Defendants' counsel, and this motion is unopposed.

CONCLUSION AND PRAYER

For these reasons, Plaintiff respectfully requests that the deadline for filing its reply be extended to March 15, 2024.

Respectfully submitted,

/s/ Matthew Baumgartner
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CERTIFICATE OF CONFERENCE

I hereby certify that on March 4, 2024, I conferred with Mr. Weston Ray, counsel for Defendants, regarding this motion for extension of time. Mr. Ray indicated to me that this motion was unopposed.

/s/ Guillermo A. Alarcón
Guillermo A. Alarcón

CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2024, a true and correct copy of the foregoing was served on all counsel of record.

/s/ Guillermo A. Alarcón

Guillermo A. Alarcón